

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

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|-----------------------------------|---|---------------------------|
| ILIO'ULAOKALANI COALITION, |) | CIVIL NO.04-00502 DAE BMK |
| a Hawai'i, nonprofit corporation; |) | |
| NA IMI PONO, a Hawaii |) | |
| unincorporated association; and |) | DECLARATION OF LIEUTENANT |
| KIPUKA, a Hawai'i unincorporated |) | GENERAL JOHN M. BROWN III |
| association, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | |
| |) | |
| DONALD H. RUMSFELD, Secretary of |) | |
| United States Department of |) | Hearing: |
| Defense; and LES BROWNLIE, Acting |) | |
| Secretary of the United States |) | Date: November 20, 2006 |
| Department of the Army, |) | Time: 9:45 |
| |) | Judge: Hon. David A. Ezra |
| Defendants. |) | |
| |) | |

I, Lieutenant General John M. Brown III, hereby declare that:

1. I am currently the Commanding General, United States Army Pacific (USARPAC). In this capacity I am missioned to organize, equip, man, station, sustain, and train assigned and attached Army units to ensure readiness for employment in the Pacific theater or worldwide during peacetime, conflict and war, synonymous with my Title 10 responsibilities. More specifically, I am required to provide combat ready Army forces to the Commander of the United States Pacific Command (PACOM), in direct support of national security operations, from security cooperation, to warfighting, to homeland defense to crisis response and disaster relief. Delaying the equipping and training of the 2/25 Stryker Brigade Combat Team (SBCT), stationed at Schofield Barracks, Hawaii, would seriously undermine the capability to execute my mission, and would increase risk

to our Soldiers, place an extreme hardship on our Soldiers and their families, and waste taxpayer dollars.

2. I have been privileged to serve as an American Soldier for more than thirty-six years. I have commanded and led American forces in combat, peace enforcement, peace keeping, humanitarian assistance, disaster relief and military engagement operations. I have served at all levels of command in Germany; Fort Bragg, North Carolina; Honduras; Iraq; Fort Stewart, Georgia; Kuwait; and Alaska. My additional assignments include Battalion Executive Officer in Korea; Professor of Military Science; Chief of Staff, 1st Armored Division, Germany and Task Force Eagle, OPERATION JOINT ENDEAVOR, Bosnia; Military Assistant to the Deputy Secretary of Defense; Assistant Division Commander for 10th Mountain Division during OPERATION JOINT FORGE, Bosnia; Director of Integration, Office of the Deputy Chief of Staff for Operations and Plans, United States Army, Washington D.C.; Deputy Chief of Staff for Training, United States Army Training and Doctrine Command, Fort Monroe, Virginia and Deputy Commanding General for Transformation, United States Army Training and Doctrine Command, Fort Lewis, Washington. I have served as the Commander, United States Army Pacific for the past twenty six months.

3. As the Commander, USARPAC, I am the Army Service Component Commander (ASCC) assigned to the Commander, PACOM with the responsibility to provide combat ready Army forces for operations within the PACOM area of responsibility or for the Commander, PACOM to send to other Combatant Commanders. Today, our highest priority mission is conducting operations as part of our nation's war on terrorism. USARPAC continues to provide combat ready forces, from detachment to division level,

for Commander, PACOM to send to Commander, US Central Command for combat operations in Iraq and Afghanistan. Today, over 16,000 of USARPAC's more than 26,000 assigned active component Soldiers are deployed in support of operations in Southwest Asia. Last year, over 24,000 active and reserve component forces assigned to USARPAC were deployed for Operation Iraqi Freedom and Operation Enduring Freedom. USARPAC also provides Army forces for Global War On Terrorism operations within the PACOM area of responsibility. Currently, USARPAC Soldiers are supporting the armed forces of the Philippines with intelligence, operational planning and logistics in their operations against fundamentalist insurgents. USARPAC headquarters and assigned forces also form the foundation of PACOM's Joint Task Force - Homeland Defense, missioned to deter, detect, disrupt and defeat threats against the security of the Hawaiian Islands, Guam, American Samoa, and the US Pacific Trust Territories and Protectorates. These threats include terrorism and natural disasters.

4. The 2/25 SBCT is a Commander, PACOM essential warfighting capability. Stryker Brigades provide the PACOM Commander early entry capable forces with mobility, situational awareness, joint interoperability and sustainability not found in any other Army combat brigades. The 2/25 is the only active brigade combat team assigned to my command in the Pacific that is not deployed to the Middle East. As such, it provides company and platoon sized contingency ready forces for PACOM responses to homeland security threats and provides units to participate in Theater Security Cooperation training and exercises with allied and neighboring armies. While using the Brigade to fulfill current PACOM missions, the USARPAC is also manning, equipping, and training the

2/25 SBCT for full spectrum operations and a deployment into combat as a part of Operation Iraqi Freedom.

5. The Operation Iraqi Freedom deployment of the 2/25 SBCT requires a full brigade, equipped and trained as one of the Army's new Stryker units. USARPAC initiated the transformation of the 2/25 to a SBCT after the Federal District Court ruled our Environmental Impact Statements were adequate and a plaintiff's request for injunction was denied, 16 months ago. Thousands of pieces of new Stryker Brigade equipment have been issued, and hundreds of pieces of old equipment have been turned in. Much more new equipment must be issued to reach brigade readiness. The 2/25 SBCT has conducted hundreds of hours of Stryker-specific individual and small unit collective training and is scheduled to conduct hundreds of additional hours of collective training in preparation for combat operations. Contracts have been issued and construction initiated on several world class training and support facilities to enable combat training of the Stryker Brigade and all other Army units based in Hawaii, American Samoa, and Guam; this includes the Hawaii Army National Guard and Army Reserve units. The 2/25 SBCT is training hard and is on schedule to meet the Army's requirement for a combat ready Stryker Brigade prepared for a full brigade deployment by November 2007.

6. Halting the 2/25 SBCT's equipping and training would severely disrupt the unit's process to achieve combat readiness. Requiring the Army to move the Soldiers of the 2/25 SBCT to locations outside Hawaii to train, separating Soldiers from their families for extended periods just prior to their year long combat deployment to Iraq, would add extreme difficulty to achieving combat readiness and place additional stress on Soldiers and families. Halting the construction of training and support facilities would incur severe


monetary penalties, waste tax payer dollars, threaten many local economy jobs, and deprive Soldiers from Army units across the Pacific of world class training opportunities.

7. Halting Stryker related training and support projects would cause severe economic consequences. Tax payers have already invested over \$63.1 million for projects under construction. Any delay or cancellation and re-award of construction contracts would increase the costs to taxpayers for these critical readiness enablers by millions of dollars. There would also be a corresponding loss in wages for employees of the contractors.

8. Disrupting the fielding of the 2/25 SBCT at this point in its preparation for deployment into combat would cause immense harm to the US Army Pacific's capability to execute our mission to provide combat ready forces to PACOM, add extreme difficulty to the brigade's already complex task of achieving combat readiness and place undue hardship on our Soldiers and families.

9. The Army has initiated actions to prepare the Supplemental Site Specific Environmental Impact Statement directed by the Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

 9 Nov 06

LIEUTENANT GENERAL JOHN M. BROWN, III Date